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Attorney for Proposed Intervenors

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA
 WESTERN DIVISION—LOS ANGELES**

YITZCHOK FRANKEL;
 JOSHUA GHAYOUM;
 EDEN SHEMUELIAN, and
 DR. KAMRAN SHAMSA

Plaintiffs,

vs.

REGENTS OF THE UNIVERSITY OF
 CALIFORNIA; MICHAEL V. DRAKE,
 President of the University of California;
 GENE D. BLOCK, Chancellor, University
 of California, Los Angeles; DARNELL
 HUNT, Executive Vice-President and
 Provost; MICHAEL BECK,
 Administrative Vice Chancellor;
 MONROE GORDEN, JR., Vice
 Chancellor; and RICK BRAZIEL,
 Assistant Vice Chancellor, each in both
 his official and personal capacities,

Defendants.

) Case No. 2:24-cv-04702-MCS-

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) **DECLARATION OF ROE 4 IN**

) **SUPPORT OF MOTION FOR**

) **LEAVE TO INTERVENE**

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) **Judge: Hon. Mark C. Scarsi**

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2 I, ROE 4, declare as follows:

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4 1. This declaration is submitted in support of Proposed Intervenor's Motion
5 for Leave to Intervene.

6 2. I am over the age of 18 and am capable of making this declaration
7 pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the contents of this
8 declaration.

9 3. I am a professor at the University of California Los Angeles.

10 4. I have been a faculty member for over 20 years.

11 5. I am Jewish. I grew up in a Jewish home and attended Hebrew school at
12 our synagogue, where I had my bar mitzvah. I continue to engage in Jewish ritual
13 practice, to identify publicly as a Jew, and to consider Jewish identity central to who I
14 am.

15 6. I am a direct descendant of Holocaust survivors who came to the United
16 States as refugees following World War II. The injunction "Never Again" is central
17 to my understanding of Jewish morality, as are the embrace of immigrants and a
18 commitment to critical inquiry that includes contentious disagreement over matters of
19 importance. I take these in part from my Jewish upbringing and education and from
20 the lessons of my family's and my people's experience of antisemitism.

21 7. These values compel me to speak out against the State of Israel's system
22 of apartheid and Jewish supremacy and its ongoing genocide of Palestinians, against
23 my government's support for those policies, and in favor of Palestinian freedom. I
24 have done so as a member of the UCLA campus community and intend to continue
25 doing so. I do so in part because Israel claims to engage in its abhorrent practices on
26 my behalf as a Jew, and so I consider it important to affirm "not in my name."

27 8. Where relevant and appropriate, I include critical engagement with
28 questions relating to Israel/Palestine in my teaching and scholarship.

1 9. I am deeply concerned about, and have been publicly critical of,
2 widespread efforts to suppress speech critical of Israel, including criticism of
3 Zionism, by falsely labeling it antisemitic. I consider Plaintiffs' lawsuit, Defendants'
4 response to it (in addition to their general recent conduct), and the Court's
5 preliminary injunction to be part of that pattern.

6 10. I fear that if the relief Plaintiffs seek is granted, it will result in the
7 further suppression by UCLA of anti-Zionist and other criticism of Israel, including
8 my own, including the threat to take disciplinary employment actions against
9 dissenting faculty and other employees.

10 11. Throughout the entire university community of which I am a part, I
11 believe that free speech and academic freedom are threatened by the conflation of
12 exposure to anti-Zionist speech, or to actions taken on the basis of Zionism, with
13 subjection to religious discrimination based on Jewishness.

14 12. I also experience this conflation as an attack on my Jewish identity
15 insofar as my government and my employer both publicly declare and impose upon
16 me their stereotypical view of what Jews do and ought to believe.

17 I declare under penalty of perjury under the laws of the United States that the
18 foregoing is true and correct. Executed this 2nd day of May, 2025, at Los Angeles,
19 California.

20 /s/Roe 4

21 Roe 4
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